



PRIVACY NOTICE 2018

Telnet treats your privacy very seriously and is committed to protecting and respecting your information.

Our Privacy Promise

Your trust is very important to us, so we're committed to keeping your data safe and secure.

We promise:

- ✓ To keep your data safe and private;
- ✓ Not to sell your data;
- ✓ To give you ways to manage your marketing choices at any time.

Telephone: +44 (0) 370 770 1000 Email: privacy@telnet-international.com Web: www.telnet-international.com

Registered & Trading Address: Unit 5, New House Business Centre, Faygate, Horsham, West Sussex, RH12 4RU

Telnet International Limited is registered in England & Wales, number 04126435

Telnet International Limited is Authorised and Regulated by the Financial Conduct Authority, number 723424.

Who we are

We are Telnet International Limited (“Telnet”).
 You can find more about us at www.telnet-international.com

This Policy applies to you if you use our services (“our Services”) and if you contact us or we contact you about our Services. It also applies to visitors to our website (“our Website”): <https://www.telnet-international.com/>

For the purpose of the European Data Protection regulations (the ‘GDPR’) and the Data Protection Act 2018 (‘the Act’) (both of which Telnet will fully comply with) the Data Controller is Telnet International Limited, Unit 5, Newhouse Business Centre, Faygate, Horsham, West Sussex, RH12 4RU.

If you have any questions, or want more details about how we use your personal data, you can ask us by emailing privacy@telnet-international.com or call us on 0370 770 1000 (+441293852182 from outside the UK).

Introduction

We are committed to protecting your privacy. We will only use the information that we collect about you lawfully and in accordance with current data protection law.

In providing you access to our Services we may be required to process your personal data. This Privacy Notice sets out the ways in which Telnet is committed to protecting and respecting your personal data, including what we do with your information and who it will be shared with. It will tell you about your privacy rights and how the law protects you.

This Privacy Notice may change at any time in the future – we will keep it up-to-date on our website for you to access at any time - www.telnet-international.com

What information will we collect about you?

When you engage with us (either directly or via a third-party), we may receive personal information about you which may include your name, address, date of birth, bank details, details about your employment, and other categories of as information outlined in the table below. This can be collected directly from you or through an agent such as an introducer, independent financial advisor, or solicitor, and may be in writing, on our website, over the telephone, by e-mail, or by some other means.

Categories of data we may collect:

Type of personal information	Description
Financial	Your financial position, status and history, payment information such as bank details, direct debit, debit or credit card details that you provide us
Contact	Your name, where you live and how to contact you, your email address and phone number
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings
Transactional	Details about payments to and from your accounts with us, and insurance claims you make
Contractual	Details about the products or services we provide to you
Locational	Data we get about where you are. This may come from your mobile phone and includes roaming information (such as the country you were in and the network you used, including date and times)
Behavioural	Details about how you use products and services from us and other organisations
Technical	Details on the devices and technology you use
Communications	What we learn about you from letters and emails you write to us and conversations between us, phone records including the numbers you call and send messages to and receive calls and messages from, the date, time length and cost of these communications including the broad location at the time of these communications; call recordings
Open Data and Public Records	Details about you that are in public records, such as the Electoral Register, and information about you that is openly available on the internet
Usage Data	Other data about how you use our products and services
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so: <ul style="list-style-type: none"> • Racial or ethnic origin • Religious, political or philosophical beliefs • Trade union membership • Genetic and bio-metric data • Health data • Lifestyle information, including data related to sex life or sexual orientation • Criminal records of convictions and offences • Allegations of criminal offences You can read how we may use special types of data in the table 'How the law protects you'
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you, whether you get paper statements, or prefer large-print formats
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number or social security number, or Tax Identification Number (TIN)

For our customers, this personal data is required to provide our Services to you. If you do not provide the personal data information we ask for, it may delay or prevent us from providing our Services to you.

You must not send us personal data about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this Privacy Notice. If you do send such personal data, we will assume he or she has consented, although we reserve the right to ask for confirmation from them. Where you do give us data about someone else, or someone else discloses a connection with you, that data may be taken into account with your other personal data.

How the law protects you

As well as our Privacy Notice, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a valid basis on which to do so. The law says we must have one or more of these valid reasons:

- To fulfil a contract we have with you, or
- When it is our legal obligation, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information, provided that it does not interfere with your fundamental rights and freedoms. If we rely on our legitimate interests, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are:

What we use your personal information for	Our reasons	Our legitimate interests
Serving you as a customer		
<ul style="list-style-type: none"> • To manage our relationship with you or your business • To develop and carry out marketing activities • To study how our customers use products and services from us and other organisations • To communicate with you about our products and services 	<ul style="list-style-type: none"> • Your consent • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Keeping our records up to date, working out which of our products and services may interest you and telling you about them • Developing products and services, and what we charge for them • Defining types of customers for new products or services • Seeking your consent when we need it to contact you • Being efficient about how we fulfil our legal and contractual duties
Business improvement		
<ul style="list-style-type: none"> • To test new products • To manage how we work with other companies that provide services to us and our customers • To develop new ways to meet our customers' needs and to grow our business 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Developing products and services, and what we charge for them • Defining types of customers for new products or services • Being efficient about how we fulfil our legal and contractual duties
Managing our operations		
<ul style="list-style-type: none"> • To deliver of our products and services • To make and manage customer payments • To manage fees, charges and interest due on customer accounts • To collect and recover money that is owed to us • To manage and provide treasury and investment products and services 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties • Complying with rules and guidance from regulators
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> • To detect, investigate, report, and seek to prevent financial crime • To manage risk for us and our customers • To obey laws and regulations that apply to us • To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect • Complying with rules and guidance from regulators • Being efficient about how we fulfil our legal and contractual duties
Business management		
<ul style="list-style-type: none"> • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit 	<ul style="list-style-type: none"> • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Complying with rules and guidance from regulators • Being efficient about how we fulfil our legal and contractual duties
<ul style="list-style-type: none"> • To exercise our rights set out in agreements or contracts 	<ul style="list-style-type: none"> • Fulfilling contracts 	
For processing special categories of personal data:		
<ul style="list-style-type: none"> • Substantial public interest 	<ul style="list-style-type: none"> • Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour • Using criminal and health information as needed to provide insurance products 	
<ul style="list-style-type: none"> • Responding to regulatory requirements 	<ul style="list-style-type: none"> • Showing whether we have assessed your situation in the right way • Passing information to the regulator as needed to allow investigation into whether we have acted in the right way 	
<ul style="list-style-type: none"> • Legal claims 	<ul style="list-style-type: none"> • Using any special categories of data as needed to establish, exercise or defend legal claims 	
<ul style="list-style-type: none"> • Consent 	<ul style="list-style-type: none"> • Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so 	

Who we share your personal data with

We will never sell or lease your personal information to any third party.

We may transfer, disclose or distribute your personal information in the following circumstances:

- where we have your permission;
- where we are required to do so by law;
- where there are legitimate interests for processing – i.e. where it is needed by our agents, advisors or others involved in running accounts and services for you or in undertaking activities linked to the operation of such services or accounts on our behalf; or
- where the transfer or disclosure would otherwise be in compliance with legal requirements we are subject to including, but not limited to, statute or regulation.

Telnet may share your personal data with these organisations:

Lenders	Financial Institutions such as banks, peer-to-peer lenders, private investors, alternative finance providers to whom we may apply for finance on your or your business' behalf.
Credit Reference Agencies*	To assess you or your business is eligible for an account or credit with us or on behalf of a lender, to check you or your business is able to afford to make repayments, to make sure what you've told us is correct, to help detect and prevent financial crime, to trace and recover debts.
Fraud Prevention Agencies	To detect fraud and money-laundering risks.
Agents / Advisors	To assist in setting up and maintaining your account, and to assist our communication with you.

* When we ask CRAs about you or your business, they will note it on your credit file. This is called a credit search. Other lenders may see this, and we may see credit searches from other lenders. We will also search other partners or directors that you are in business with. You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. Here are links to each of the three main Credit Reference Agencies:

- Callcredit <http://www.callcredit.co.uk/crain>
- Equifax <http://www.equifax.co.uk/crain>
- Experian <http://www.experian.co.uk/crain>

We may also share your personal information if the make-up of Telnet changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our Group happens, then other parties may use your data in the same way as set out in this notice.

Where we store your personal data

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice.

We will only send your data outside of the European Economic Area ('EEA') to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents and advisors who we use to run your accounts and services.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. We may transfer your personal data to recipients located in countries outside of the EEA which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and applicable data privacy laws.

How long we keep your personal data

We will keep your personal data for as long as you are a customer of Telnet. After you stop being a customer, we may keep your data for up to for 7 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us (e.g. 2007 Anti-Money Laundering regulations).

We may keep your personal data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes. We may also keep it for research or statistical purposes unless you object.

Automated Decisions

We or our lenders may use a system to decide whether to lend money to you or your business, when you apply for credit - this is called credit scoring. It uses past data to assess how you're likely to act while paying back any money you borrow. This includes data about similar accounts you may have had before.

Credit scoring uses data from three sources:

- Your application
- Credit reference agencies
- Data we may already hold.

It gives an overall assessment based on this information. Banks and other lenders use this to help make responsible lending decisions that are fair and informed. Credit scoring methods are tested regularly to make sure they are fair and unbiased.

As a person you have rights over automated decisions. You can ask that we or our lenders do not make our decision based on the automated score alone. You can object to an automated decision and ask that a person reviews it. If you want to know more about these rights, please contact us.

Call Recordings and Customer's Rights

The recording and keeping of calls from individuals is covered by 3 main laws in the UK. These are:

1. Regulations of Investigatory Powers Act 2000 (RIPA) – which regulates the interception of calls, allows for calls to be collected if the business has obtained the customer's consent. - Consent can only be given, if the customer is asked/ informed, or if it falls within one of the exceptions of the Lawful Business Regulations.
2. Data Protection Act 1998 (DPA) / GDPR- regulates personal data capture, usage & storage, which also requires consent to be given by the end user.
3. Telecommunications (Lawful Business Practice) (Interception of Communications) Regulation 2000 - Lawful Business regulations do allow for calls to be recorded without consent for a number of situations, however; *if the information within the call can be determined in any way to be personal, the Data Protection Act would come into force and customers would need to be informed.*

So, in short, businesses should be informing end customers that their calls are recorded to allow the end customer to make an informed choice if they wish to carry on the conversation. If end customers carry on the conversation they are deemed to have given consent. It should however be noted that if businesses are unsure about their obligations under this legislation and the ability to record calls they should obtain independent legal advice.

How to get a copy of your personal data

You can access your personal information we hold by writing to us at this address:

DSAR Unit, Telnet International Ltd, Unit 5, Newhouse Business Centre, Faygate, Horsham, West Sussex, RH12 4RU

You have the right to access your personal data from us in a format that can be easily re-used and therefore passed on in this format to other organisations. Please indicate you would like your personal data in this format when writing to us.

Letting us know if your personal data is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal data?

You have the right to object to our use of your personal data, or to ask us to delete, remove, or stop using your personal data if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data but please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted. You can ask us to restrict the use of your personal data if:

- it is not accurate;
- it has been used unlawfully but you don't want us to delete it;
- it not relevant any more, but you want us to keep it for use in legal claims;
- you have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it; or
- if you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.



How to complain

Please let us know if you are unhappy with how we have used your personal data. You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern - <https://ico.org.uk/concerns/>.

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